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FEDERAL ELECTION
COMMISSION MAIL ROOM

2000 MAY 19 P 1:52

IMC Global Inc.
2100 Sanders Road
Northbrook, Illinois 60062-6146
847.272.9200

May 17, 2000

Lucy J. Denny, Reports Analyst
Reports Analysis Division
Federal Election Commission
Washington, D.C. 20463

Identification Number: C00225367
Reference: Year End Report (7/1/98 - 12/31/99)

Dear Ms. Denny:

In response to your inquiry regarding our PAC contributions appearing to exceed the FEC limits, IMC Global is not affiliated with Mallinckrodt Inc.

In 1988 IMC Fertilizer IPO'ed from International Minerals and Chemicals and became a freestanding company. IMC Fertilizer has since changed its name to IMC Global.

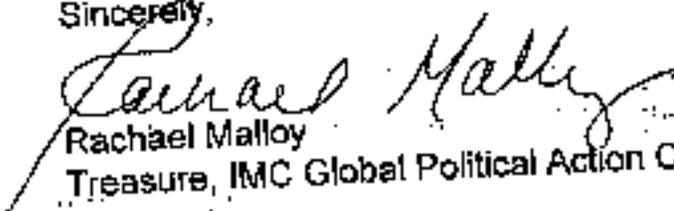
Shortly after this split, International Minerals and Chemicals changed its name to IMCERA, and has since become Mallinckrodt Inc.

Therefore, since IMC Global is not in way affiliated with Mallinckrodt Inc. our contribution amounts to a candidate should not be combined with Mallinckrodt's to determine maximum amounts.

If you have any questions please contact me at (847) 412-5855.

Thank you.

Sincerely,


Rachael Malloy
Treasurer, IMC Global Political Action Committee

RM/klw



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Rachael Malloy, Treasurer
IMC Global Operations Inc. Political
Action Committee
2100 Sanders Road
Northbrook, IL 60062

Identification Number: C00225367

MAY 3 2000

Reference: Year End Report (7/1/99-12/31/99)

Dear Ms. Malloy:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule B of your report (pertinent portion(s) attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. 2 U.S.C. §441a(a) precludes a multicandidate committee and its affiliates from making a contribution to a candidate for federal office in excess of \$5,000 per election.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. If you have made an excessive contribution, you should notify the recipient and request a refund of the amount in excess of \$5,000 and/or notify the recipient in writing of your redesignation of the contribution. In the best interest of your committee, all refunds and redesignations should be made within sixty days of the treasurer's receipt of the contribution(s).

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund request sent to the recipient committee(s). In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received. Any redesignations should be disclosed as memo entries on Schedule B supporting Line 23 of the report covering the period during which the redesignation is made. 11 CFR §110.1(b)

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IMC GLOBAL OPERATIONS INC. POLITICAL ACTION COMMITTEE

Although the Commission may take further legal action regarding the excessive contribution(s), your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

-The beginning cash balance of this report should equal the ending balance of your 1999 Mid-Year Report. Please clarify this discrepancy and amend any subsequent report(s) that may be affected by this correction.

-The totals listed on Lines 6(c), 11(a)(i), 11(a)(ii), 11(a)(iii), 11(d), 17, 19, 23, and 29, Column B of the Summary and Detailed Summary Page appear to be incorrect. Please be advised that you should add the "Calendar Year-to-Date" total from your previous report to the current "Total This Period" figure from Column A to derive the correct Column B total. Please amend your report and any subsequent reports that may be affected by this correction.

-Commission Regulations require that a committee disclose the identification of all individuals who contribute in excess of \$200 in a calendar year. (11 CFR §104.3(a)(4)(i)) Identification for an individual is defined as the full name, mailing address, occupation and name of employer. (11 CFR §100.12) Your report discloses contributions from individuals for which the identification is not complete.

You must provide the missing information, or if you are unable to do so, you must demonstrate that "best efforts" have been used to obtain the information. To establish "best efforts," you must provide the Commission with a detailed description of your procedures for requesting the information. Establishing "best efforts" is a three-fold process.

First, your original solicitation must include a clear and conspicuous request for the contributor information and must inform the contributor of the requirements of federal law for the reporting of such information. (11 CFR §104.7(b)(1))

Second, if the information is not provided, you must make one follow-up, stand alone effort to obtain this information, regardless of whether the contribution(s) was solicited or not. This effort must occur no later than 30 days after receipt of the contribution and may be in the form of a written

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IMC GLOBAL OPERATIONS INC. POLITICAL ACTION COMMITTEE

request or an oral request documented in writing. (11 CFR § 104.7(b)(2))
The request must:

- clearly ask for the missing information, without soliciting a contribution;
- inform the contributor of the requirements of federal law for the reporting of such information, and
- if the request is written, include a pre-addressed post card or return envelope.

Third, if you receive contributor information after the contribution(s) has been reported, you shall either a) file with your next regularly scheduled report, an amended memo Schedule A listing all the contributions for which additional information was received; or b) file on or before your next regularly scheduled reporting date, amendments to the report(s) originally disclosing the contribution(s). (11 CFR §104.7(b)(4))

Please provide the missing information or a detailed description of your procedures for requesting the information. For more information on demonstrating "best efforts," please refer to the Campaign Guide.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,



Lucy J. Denny
Reports Analyst
Reports Analysis Division

SCHEDULE B

 ITEMIZED DISBURSEMENTS RECEIVED
 FEDERAL ELECTION
 COMMISSION MAIL ROOM

 Use separate schedule(s)
 for each category of the
 Detailed Summary Page

 PAGE 1 OF 4
 FOR LINE NUMBER 23

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

2800 MAY 19 11:52

NAME OF COMMITTEE (in Full)

IMC Global Operations Inc. Political Action Committee

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Ashcroft for US Senate 2000 507 Capitol Court, NE Suite 100 Washington, DC 20002	John Ashcroft, U.S. SENATE MD Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) 2000	09/13/99	1,000.00
B. Full Name, Mailing Address and ZIP Code A Lot of People Who Support Jeff Bingaman	Jeff Bingaman, U.S. SENATE NM Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) 2000	09/13/99	1,000.00
C. Full Name, Mailing Address and ZIP Code Friends of Conrad Burns P O Box 70397 Washington, DC 20024	Conrad Burns, U.S. SENATE MT Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) 2000	09/13/99	1,000.00
D. Full Name, Mailing Address and ZIP Code Roth Senate Committee P O Box 105 Wilmington, DE 19899	William V. Roth, U.S. SENATE DE Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) 2000	09/13/99	2,000.00
E. Full Name, Mailing Address and ZIP Code Judy Biggert for Congress P O Box 637 Mundeville, IL 60522-0637	Judy Biggert, U.S. HOUSE 13th IL Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) 2000	09/13/99	500.00
F. Full Name, Mailing Address and ZIP Code Cubin for Congress P O Box 4657 Casper, WY 82604	Barbara Cubin, U.S. HOUSE AL WY Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) 2000	09/13/99	1,000.00
G. Full Name, Mailing Address and ZIP Code Jefferson Committee (for Congress) P O Box 77137 Washington, DC 20013	William J. Jefferson, U.S. HOUSE 2nd LA Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) 2000	09/13/99	1,000.00
H. Full Name, Mailing Address and ZIP Code Friends Of Jack Kingston P O Box 2133 Savannah, GA 31402	Jack Kingston, U.S. HOUSE 1st GA Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) 2000	09/13/99	1,000.00
I. Full Name, Mailing Address and ZIP Code Friends Of Ray LaHood 3311 N. Sterling Suite 10 Peoria, IL 61604	Ray LaHood, U.S. HOUSE 18th IL Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) 2000	09/13/99	500.00
			9,000.00

SUBTOTAL of Disbursements This Page (optional)

TOTAL This Period (last page this line number only)

SCHEDULE B	ITEMIZED DISBURSEMENTS	Use separate schedule(s) for each category of the Detailed Summary Page	49 / 54
			FOR LINE NUMBER 23

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)
Mallinckrodt Inc. Political Action Committee

Full Name, Mailing Address, and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Sen. ASHCROFT FOR US SENATE 507 CAPITOL COURT N.E. STE 100 WASHINGTON DC 20002	(Senate - -) CK 2103 Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) :	07/07/1999	2500.00
Rep. Joseph Barton Box 1444 Enrig TX 75120	(House - TX - 6) CK 2113 Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) :	07/07/1999	1000.00
Sherwood Boehlert P O Box C Utica NY 13503	(House - NY -) CK 2114 Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) :	07/07/1999	1000.00
John Boehner 7908 Cincinnati- Dayton Road Suite 1 West Chester OH 45069	(House - OH -) CK 2115 Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) :	07/07/1999	1000.00
Brown Friends of Sherrod 607 14th Street N.W. 800 Washington DC 20005	CK 2115 Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) :	07/07/1999	1000.00
Mr Richard Burr PO Box 5732 Winston Salem NC 27113	(House - NC - 2) CK 2117 Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) :	07/07/1999	1000.00
Christopher Cox Christopher Cox Congressional Comm PO Box 8088-C Newport Beach CA 92658	(House - AZ - 7) CK 2116 Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) :	07/07/1999	1000.00
Cunningham Friends of P O Box 40227 San Diego CA 92164	CK 2119 Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) :	07/07/1999	1000.00
Tom DeLey Tom DeLey Congressional Committee 10707 Corporate Dr. Suite 130 Stafford TX 77477	(House - TX - 22) CK 2120 Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) :	07/07/1999	1000.00

SUBTOTALS of Disbursements This Page (Optional)

TOTALS This Period (last page this line number only)

SCHEDULE B

ITEMIZED DISBURSEMENTS

Use separate schedule(s) for each category of the Detailed Summary Page

FOR LINE NUMBER 23

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NAME OF COMMITTEE (In Full)
Mallinckrodt Inc. Political Action Committee

Full Name, Mailing Address, and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Sen. ASHCROFT FOR US SENATE 507 CAPITOL COURT N.E. STE 100 WASHINGTON DC 20002	(Senate - -) check #2067 Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	03/29/1999	5000.00
Italian American Leadership PAC 1275 K St. NW Suite 602 Washington CT 20005	Purpose of Disbursement CK NO 2094 (CK NO 2094) Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	03/29/1999	400.00
Sen. Jim Jeffords 507 Capitol Court NE-STE 100 Washington DC 20002	Purpose of Disbursement ck#2098 Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	04/21/1999	1000.00
Mr. Jim Ramstad 8100 Penn Avenue S. Suite 104 Bloomington MN 55431	Purpose of Disbursement (House - MN -) ck#2101 Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	05/17/1999	400.00
Democratic Leaders Victory Fund 2000 7435 Watson Road, Ste 107 St. Louis MO 63119	Purpose of Disbursement ck#21002 Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	06/02/1999	5000.00

SUBTOTALS of Disbursements This Page (Optional)

TOTALS This Period (last page this line number only)

11800.00

SCHEDULE B

ITEMIZED DISBURSEMENTS

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NAME OF COMMITTEE (in Full)
Mallinckrodt Inc Political Action Committee

AD

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Ann Eshoo for Congress 555 Bryant St # 335 Palo Alto, CA 94301	Ann Eshoo U.S. Cong CA-14 Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	7/30/97	\$ 500 ⁻
B. Full Name, Mailing Address and ZIP Code The John Bray Committee Box 4042 Baton Rouge LA 70821	Purpose of Disbursement John Bray LA Senate Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	7/30/97	\$ 1000 ⁻
C. Full Name, Mailing Address and ZIP Code Aschraft 2000 13175 Ledger Road St. Louis, MO 63017	Purpose of Disbursement John Aschraft MO Senate Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	8/26/97	\$ 2500 ⁻
D. Full Name, Mailing Address and ZIP Code Robinson for Congress PO Box 17588 Fr. Mitchell, KY 41017	Purpose of Disbursement Robinson (KY-4) Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	7/30/97	200 ⁻
E. Full Name, Mailing Address and ZIP Code Faircloth for Senate Committee PO Box 26585 Raleigh, NC 27611	Purpose of Disbursement Faircloth SENATE - NC Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	9/30/97	500 ⁻
F. Full Name, Mailing Address and ZIP Code Karen McCarthy for Congress 111 Valentine Rd Kansas City, MO 64111	Purpose of Disbursement McCarthy Congress - (MO-5) Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/28/97	500 ⁻
G. Full Name, Mailing Address and ZIP Code Friends of Dick Durbin PO Box 1949 Springfield, IL 62075	Purpose of Disbursement Dick Durbin Senate - IL Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/28/97	500 ⁻
H. Full Name, Mailing Address and ZIP Code Hulshof for Congress PO Box 1621 Columbia, MO 65205	Purpose of Disbursement Benny Hulshof MO-9 Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	11/21/97	500 ⁰⁰
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		

SUBTOTAL of Disbursements This Page (optional)	
TOTAL This Period (test page this line number only)	6200 ⁰⁰

